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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224067
Party	Defendant Tielsa GmbH
Correspondence Address	DANIELA FUESSEL FUESSEL LAW 475 WASHINGTON BLVD LOS ANGELES, CA 90292 UNITED STATES schiller@f-200.com, office@f-200.com
Submission	Answer
Filer's Name	Daniela Füssel
Filer's e-mail	office@f-200.com, schiller@f-200.com
Signature	/Daniela Fuessel/
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Matter of:

Larry Paletz,
Opposer,
v.
Tielsa GmbH,
Applicant

Opposition No: 91224067
Serial No: 79143534

21/12/2015

ANSWER TO NOTICE OF OPPOSITION

In response to the Notice of Opposition issued by the Board on September 25, 2015, Tielsa GmbH ("Applicant") hereby responds to Larry Paletz ("Opposer") as follows:

To the extent that any heading, statements or unnumbered paragraphs in the Notice of Opposition are considered allegations, they are denied.

1. The information of paragraph 1 are admitted.
2. The information of paragraph 2 are admitted.
3. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 3 concerning the activities of the opposer and therefore denies the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 4 and therefore denies the same.
5. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 5 and therefore denies the same.
6. The information of paragraph 6 are admitted.
7. The information of paragraph 7 are admitted.
8. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 8 and therefore denies the same.
9. The allegations of paragraph 9 are denied. Furthermore, the applicant acknowledges that the oppose didn't sale any tielsa kitchens later than 2005
10. The information of paragraph 10 are admitted.
11. The information of paragraph 11 are admitted.
12. The information of paragraph 12 are admitted.
13. The information of paragraph 13 are admitted.
14. The information of paragraph 14 are admitted.
15. The information of paragraph 15 are admitted.
16. The information of paragraph 16 are admitted.
17. The information of paragraph 17 are admitted.

18. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 18(13) and therefore denies the same.
19. The information of paragraph 19(14) are admitted.
20. The information of paragraph 20(15) are admitted.
21. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 21 (16) about the knowledge of the lawyers of Ashurst and therefore denies the same.
22. The allegations of paragraph 21 (16) are denied, but it shows clearly that the Trademark tielsa was 2007 no longer important for the applicant.
23. The allegations of paragraph 23 (18) concerning the Trademark tielsa are denied, especially the applicant wasn't aware of the use by the oppose.
24. The information of paragraph 24 (19) are admitted.
25. The information of paragraph 25 (20) are admitted.
26. The information of paragraph 26 (21) are admitted.
27. The information of paragraph 27 (22) are admitted.
28. The information of paragraph 28 (23) are irrelevant and not related to the trademark tielsa but are admitted.
29. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 29(24) and therefore denies the same.
30. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 30(25) and therefore denies the same.
31. The allegations of paragraph 31 (26) are irrelevant and not related to the trademark tielsa but are denied.
32. The information of paragraph 32 (27) are irrelevant and not related to the trademark tielsa but are admitted.
33. The information of paragraph 33(28) are admitted.
34. The allegations of paragraph 34 (29) concerning the use of the Trademark tielsa are denied.
35. The information of paragraph 35 (30) are admitted.
36. The allegations of paragraph 36 (31) are denied.
37. The information of paragraph 37 (32) are admitted.
38. The information of paragraph 38 (33) are admitted.
39. The allegations of paragraph 39 (34) are denied.
40. The allegations of paragraph 40 (35) are denied.
41. The allegations of paragraph 41 (36) are denied.
42. The information of paragraph 42 (37) are irrelevant and not related to the trademark tielsa but are admitted.
43. The information of paragraph 43 (38) are irrelevant and not related to the trademark tielsa but are admitted.
44. The information of paragraph 44 (39) are irrelevant and not related to the trademark tielsa but are admitted.
45. The information of paragraph 45 (40) are irrelevant and not related to the trademark tielsa but are admitted.
46. The allegations of paragraph 46 (41) are denied.
47. The allegations of paragraph 47 (42) are denied.
48. The allegations of paragraph 48 (43) are denied.
49. The allegations of paragraph 49 (44) are denied.
50. The allegations of paragraph 50 (45) are denied.
51. The information of paragraph 51 (46) concerning the Trademark tielsa are admitted concerning the Trademark Wellmann are irrelevant and not related to the Trademark tielsa

52. The allegations of paragraph 52 (47) are denied.
53. The allegations of paragraph 53 (48) are denied.
54. The information of paragraph 54 (49) are admitted.
55. The allegations of paragraph 55 (50) are denied.
56. The information of paragraph 56 (51) are admitted.
57. The allegations of paragraph 57 (52) are denied.
58. The allegations of paragraph 58 (53) are denied.
59. The allegations of paragraph 59 (54) are denied.
60. The information of paragraph 60 (55) are admitted.
61. The information of paragraph 61 (56) are admitted.
62. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 62(57) and therefore denies the same.
63. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 63(58) and therefore denies the same.
64. The allegations of paragraph 64 (59) are denied.
65. The information of paragraph 65 (60) are admitted.
66. The allegations of paragraph 66 (61) are denied.
67. The allegations of paragraph 67 (62) are denied.
68. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 68(63) and therefore denies the same.
69. Applicant is without knowledge or information sufficient to form a belief as to the allegations of paragraph 69(64) and therefore denies the same.
70. The allegations of paragraph 70 (65) are denied.
71. The allegations of paragraph 71 (66) are denied.
72. The allegations of paragraph 72 (67) are denied.
73. The allegations of paragraph 73 (68) are denied.
74. The information of paragraph 74 (69) are admitted.
75. The information of paragraph 75 (70) are admitted.
76. The allegations of paragraph 76 (71) are denied.
77. The allegations of paragraph 77 (71) are denied.
78. The allegations of paragraph 78 (72) are denied.
79. The allegations of paragraph 79 (73) are denied.
80. The allegations of paragraph 80 (74) are denied.
81. The allegations of paragraph 81 (75) are denied.
82. The allegations of paragraph 82 (76) are denied.
83. The allegations of paragraph 83 (77) are denied.
84. The allegations of paragraph 84 (78) are denied.
85. The allegations of paragraph 85 (79) are denied.

Applicant further denies that Opposer has any valid ground for opposing registration of Applicant's Application Serial No. 79143534.

Respectfully submitted this 21st day of Dezember, 2015

Respectfully submitted,

Tielsa GmbH

By: /Daniela Fuessel/
Fuessel LAW
475 Washington Blvd
Los Angeles, CA 90292
(323) 682.8240
office@f-200.com

*Attorney for Applicant Tielsa
GmbH*

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Motion to Extend Time to Answer has been served on the following by mailing said copy on December 21, 2015, via electronic mail and First Class Mail, postage prepaid:

LARRY PALETZ
1493 CAMINITO SOLIDAGO
LA JOLLA, CA 92037
UNITED STATES
Opposer DCS

By: /Daniela Fuessel/
Attorney for the Applicant
Fuessel LAW
475 Washington Blvd
Los Angeles, CA 90292
(323) 682.8240
office@f-200.com